

REMARKS

This is a response to the Office Action mailed on July 14, 2005. A diligent effort has been made to respond to each of the rejections contained in the Office Action. It is believed that this response overcomes those rejections and thus places this case in condition for allowance.

In the Office Action, claims 1, 8, 13, 24, 31, 36, and 46 were rejected under 35 U.S.C. § 112 as failing to comply with the written description requirement. This rejection is traversed because these limitations are disclosed several times throughout the specification. For example, Fig. 3 and its accompanying description clearly show the steps of filtering and displaying messages "after the current SMS electronic message is displayed on the viewing screen." There are no steps in Figure 3 that require user input after step 52 (set current message), which equates to the limitation of "after the current message is displayed on the viewing screen." Other descriptions of the rejected limitation are also present in the specification. Furthermore, much of this limitation is recited in at least original claim 1. Original claims are part of the specification, and thereby are self-supporting for purposes of § 112.

In the Office Action, claims 1-46 were rejected under 35 U.S.C. § 103 as being unpatentable over Microsoft Outlook in view of U.S. Patent No. 6,151,507 to Laiho et al. Applicants respectfully disagree with these rejections.

Regarding claims 1 and 24, as the Examiner admitted in the previous Office Action, Microsoft Outlook does not teach the following limitations: "wherein the one or more select SMS messages and the current SMS electronic message are displayed as a single thread on the viewing screen;" or "wherein after the current SMS electronic message is displayed on the viewing screen, the message software interface module is configured to perform the operations of (b) automatically filtering each of the SMS electronic messages stored in the memory device and (c) automatically displaying the one or more select SMS messages without requiring user input." Applicants submit that Laiho does not teach these limitations either.

The Figures (3a and 3b) and accompanying description that the Examiner pointed to as showing these limitations in Laiho deal only with a user selecting a series of options after the user selects a stored message or has written a new message. After the message is written (or selected and edited) and displayed (A), the user can select to enter the SMS editor options selection list (B). A selection list is displayed (C) and the user may select one of six options: settings (D), send (E), send as (F), archive (G), clear all (H), or return to SMS editor (I). None of this reads on any of the limitations that the Examiner alleges that Laiho teaches. In particular, there is no disclosure of a "single thread." The word "thread" is not even present in the entire patent, and no other words or Figures indicating something similar to a thread are disclosed either. The steps taught by Laiho (A-I) require several user inputs. Thus, the "without requiring user input" limitation is clearly not met. The steps of filtering and displaying selected SMS messages are also not taught by Laiho. Applicants have reviewed the entire Laiho reference and found nothing that teaches the limitations in question.

Applicants also reassert that Microsoft Outlook does not teach automatically displaying the current message in a single message thread with select stored messages, as claimed. As illustrated in Figure 2 of the present application, automatically displaying the current message 22 in a single message thread 26 with related stored messages 24 enables the wireless device user to easily place the message in context, without requiring the user to perform a manual search with Outlook-style pull-down menus. This is particularly advantageous in a mobile device in which display space is limited and minimal user input is often desired. These same constraints are not present in traditional, computer-based email applications, such as the cited Outlook reference.

Accordingly, each element of independent claims 1 and 24 has not been shown to be taught or suggested by the references of record. Therefore, Applicants request that the rejections of claims 1 and 24 and their dependent claims (2-7, 25-30) be withdrawn.

Regarding claims 8 and 31, the rejection of these claims did not even mention the limitation of "without requiring user input." As expressed above, Microsoft Outlook requires user input to pull down the menus and conduct the search, and Laiho also requires several user inputs as part of the methods described in the cited passage. This limitation has clearly not been shown by the cited references.

Furthermore, the limitation of "automatically locates one or more select SMS messages by filtering each SMS electronic message stored in the memory device to identify stored SMS electronic messages having indexing data that falls within a pre-set storage proximity range in relation to the current SMS electronic message" is not shown in the cited references. The Examiner admits that Outlook does not show a storage proximity range based on indexing data. Laiho does not show this either. The cited portions of Laiho do not mention anything about "consecutive numbering," "ordinal values," or a "message ID." The words "ordinal" "consecutive" "numbered" and "numbering" do not appear anywhere in Laiho, and the only thing that might be considered a message ID in Laiho is the "identifier tag" described at col. 20, lines 49-65, which is a user entered tag, not one that is automatically generated by the processor. Thus, this limitation has not been shown either.

Furthermore, as discussed above, the limitation of "wherein the one or more select SMS messages and the current SMS electronic message are displayed as a single thread on the viewing screen" is simply not taught by Laiho as the Office Action alleges. There is nothing that shows or teaches a single thread in Laiho. The Office Action also admits that this element is not present in Outlook.

Therefore, for at least the three reasons given above, the rejections of independent claims 8 and 31 are not valid. Additionally, each of the claims depending on claims 8 and 31, (claims 9-12 and 32-35), should be allowable for at least the same reasons.

Regarding the rejections of claims 13 and 36, as discussed above, the references fail to teach or suggest the limitation of displaying the selected messages as a single thread. For this reason alone the rejections are invalid.

Furthermore, the rejection of claim 13 is invalid because the limitation of locating and displaying selected messages without user input is not taught or suggested by the references and is not even addressed in the rejection. And the limitation of "identifying a current outside address, automatically identifying an outside address, automatically comparing and automatically displaying are performed without requiring user input" of claim 36 is also not taught or suggested by the references and is not addressed in the rejection.

Accordingly, for at least the two reasons given above, independent claims 13 and 36 and their dependent claims 14-23 and 37-45 should be allowable over the cited art.

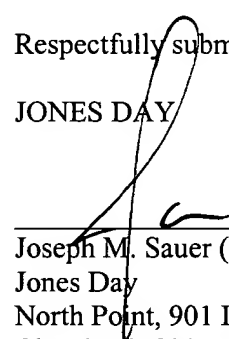
Regarding the rejection of claim 46, the following limitation was not addressed in the rejection and is not taught by either of the references: "wherein the steps of automatically identifying, automatically comparing and automatically appending are performed without requiring user input." Outlook requires the user to select to enter a search mode, and then the user must enter the search parameters to perform tasks that are somewhat similar to some of the limitations claimed in claim 46. However, Laiho does not teach doing any of the claimed limitations without user input. Accordingly, this rejection should be withdrawn.

Furthermore, at least two other limitations of claim 46 are not taught by the references: there is no teaching of displaying messages in a single thread or indexing data that is a proximity range. The absence of these limitations in the cited prior art has been discussed above. Accordingly, the rejection of claim 46 should be withdrawn.

Having overcome the rejections set forth in the Office Action, Applicants respectfully request a notice of allowance for this application. If there are any remaining issues to be resolved in this application, Applicants invite the Examiner to call the undersigned Attorney to resolve these issues.

Respectfully submitted,

JONES DAY



Joseph M. Sauer (Reg. No. 47,919)
Jones Day
North Point, 901 Lakeside Avenue
Cleveland, Ohio 44114
(216) 586-7506